

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118



COMPLIANCE EVALUATION INSPECTION

**MARATHON OIL COMPANY
DETROIT, MI
MID 005 506 357**

FINAL REFERRAL PACKAGE

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460**

| | | |
|-----------------------------|---|---|
| Work Assignment No. | : | R05054 |
| EPA Region | : | 5 |
| Site No. | : | MID 005 506 357 |
| Date Prepared | : | September 24, 1992 |
| Contract No. | : | 68-W9-0006 |
| Prepared by | : | PRC Environmental Management, Inc. (Mary Joyce Freibert) |
| Contractor Project Manager | : | Deb Harrity |
| Telephone No. | : | (312) 856-8700 |
| EPA Work Assignment Manager | : | Allen Wojtas |
| Telephone No. | : | (312) 886-6194 |

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**PART I
SUMMARY**

SUMMARY

RELEVANT INFORMATION

Facility: Marathon Oil Company
1300 South Fort Avenue
Detroit, MI 48217

EPA ID No.: MID 005 506 357

Contact: Jeff Bruestle

Phone No.: (313) 843-9100

Inspectors: Mary Joyce Freibert, PRC Lead Inspector
Gina L. Gulseth, PRC Inspector

Phone No.: 312/856-8700

PROJECT BACKGROUND

PRC Environmental Management, Inc. (PRC), received Work Assignment No. R05054 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9). This assignment calls for PRC to conduct compliance evaluation inspections (CEI) of treatment, storage, and disposal (TSD) facilities in Region 5 that import or export hazardous waste.

PRC conducted a CEI at the Marathon Oil Company (Marathon) facility in Detroit, Michigan, on July 29, 1992. This referral package briefly presents PRC's scope of work for the CEI and discusses potential violations identified during the inspection. The referral package contains three parts: Part I presents a summary of PRC's inspection; Part II contains the CEI checklist; and Part III provides supporting evidence for the CEI.

Marathon operations include refining of crude oils. The facility generates wastewater sludge (K051) in liquid and solid states and exports then to Laidlaw Environmental Services, Limited (Laidlaw) (formerly Tricil, Limited), in Corunna, Ontario (MIT 270 019 904). The facility ships the wastewater sludge about six times annually. In 1991, Marathon generated about 120 tons of wastewater sludge, all of which was exported to Laidlaw.

POTENTIAL VIOLATIONS

PRC inspected the Marathon facility on July 29, 1992. The inspection included records review and interviews with facility personnel. At the time of inspection, Marathon

representatives informed PRC that the facility is operating as a large-quantity generator of hazardous waste. Part III includes supporting evidence for this status. During the inspection, PRC noted a potential violation of the Code of Federal Regulations (40 CFR). This potential violation is listed below.

1. **Potential Violation -- [40 CFR 262.53(c)].** The facility did not submit a renotification indicating a change to its original notification for exporting wastewater sludge. In 1992, the facility exported wastewater sludge as a K051 waste only; however, the notification of intent to export, dated January 27, 1992, and the EPA Acknowledgement of Consent to export, dated March 6, 1992, list K051 and F037 waste codes.

PART II
COMPLIANCE EVALUATION INSPECTION CHECKLIST

TSD-RCRA IMPORTER/EXPORTER INSPECTION REPORT

Name Marathon Oil Company EPA ID No. MID 005 506 357

Location Address: 1300 South Fort Avenue
Detroit, MI 48217

Mailing Address: 1300 South Fort Avenue
Detroit, MI 48217

Ownership: Marathon Oil Company County: Wayne

Contact: Jeff Bruestle Telephone: (313) 843-9100

Facility Type: 2
1 = Importer
2 = Exporter
3 = Importer and Exporter

| Person(s) Interviewed: | Title: | Telephone: |
|---------------------------|--|-----------------------|
| <u>Jeff Bruestle</u> | <u>Advanced Environmental Engineer</u> | <u>(313) 843-9100</u> |
| <u>Brian Van der Hoff</u> | <u>Environmental Engineer</u> | <u>(313) 843-9100</u> |

| Inspectors: | Agency: | Telephone: |
|----------------------------|---|-----------------------|
| <u>Mary Joyce Freibert</u> | <u>PRC Lead Inspector, EPA Contractor</u> | <u>(312) 856-8700</u> |
| <u>Gina L. Gulseth</u> | <u>PRC Inspector, EPA Contractor</u> | <u>(312) 856-8700</u> |

Date/Time of Inspection: 7/29/92 / 10:45 a.m.

GENERAL MANIFEST REQUIREMENTS

| | <u>OK</u> | <u>DF</u> | <u>NA</u> |
|---|-----------|-----------|-----------|
| (A) <u>IMPORTER REQUIREMENTS:</u> | | | |
| (1) Has the importer of hazardous waste received a manifest OMB control number 2050-0039 on EPA Form 8700-22, and if necessary, EPA Form 8700-22A? <u>40 CFR 262.60(b) and 262.20(a)</u> | - | - | <u>X</u> |
| Does the manifest include the following: | | | |
| (a) Name and address of the foreign generator, and the name, address, and EPA ID number of the importer? <u>40 CFR 262.60(b)(1)</u> | - | - | <u>X</u> |
| (b) Signatures of both the U.S. importer or his agent, and the initial transporter, and date on the certification? <u>40 CFR 262.60(b)(2)</u> | - | - | <u>X</u> |
| (2) Has the importer obtained the manifest form from the consignment state if the state supplied the manifest and required its use (Note: if the state did not supply the manifest form, then the manifest may be obtained from any source)? <u>40 CFR 262.60(c)</u> | - | - | <u>X</u> |
| (B) <u>IMPORTER REQUIREMENTS:</u> | | | |
| (1) Has the Importer notified the Regional Administrator/MDNR Regional Director of receipt of hazardous waste from a foreign source? <u>40 CFR 264/265.12(a)</u> | - | - | <u>X</u> |
| (2) If so, was the notification in writing, and sent four weeks in advance of the date the waste was expected to arrive at the facility (Note: notice of subsequent shipments of the same waste is not required)? <u>40 CFR 264/265.12(a)</u> | - | - | <u>X</u> |
| (C) <u>EXPORTER REQUIREMENTS:</u> | | | |
| (1) Has the exporter submitted a renotification, and obtained an EPA Acknowledgement of Consent, if any changes have been made to the original notificaiton? <u>40 CFR 262.53(c)</u> | - | <u>X</u> | - |
| (2) Has the exporter submitted manifests as required in 40 CFR 262.20 through 262.23? <u>40 CFR 262.54</u> | <u>X</u> | - | - |
| Does the manifest contain the following information: | | | |
| (a) Name and site address of the consignee? <u>40 CFR 262.54(a)</u> | <u>X</u> | - | - |

| | <u>OK</u> | <u>DF</u> | <u>NA</u> |
|---|-----------|-----------|-----------|
| (b) Name and site address of any alternate consignee? <u>40 CFR 262.54(b)</u> | <u>X</u> | — | — |
| (c) The point of departure from the United States identified in Special Handling Instructions? <u>40 CFR 262.54(c)</u> | <u>X</u> | — | — |
| (d) The following sentence in Item 16 of the Uniform Hazardous Waste manifest form: "and conforms to the terms of the attached EPA Acknowledgement of Consent"? <u>40 CFR 262.54(d)</u> | <u>X</u> | — | — |
| (3) Has the exporter obtained the manifest form from the exporter's State (Note: if the State does not supply the manifest, it can be obtained from any source)? <u>40 CFR 262.54(e)</u> | <u>X</u> | — | — |
| (4) Does the exporter have a signed copy of the manifest from the consignee confirming delivery? <u>40 CFR 262.54(f)</u> | <u>X</u> | — | — |
| (5) If a shipment could not be delivered to the designated or alternate consignee, did the exporter do the following: | | | |
| (a) Renotify EPA of changes in the original notification, and obtain an EPA Acknowledgement of Consent prior to delivery?, or <u>40 CFR 262.54(g)(1)</u> | — | — | <u>X</u> |
| (b) Instruct the transporter to return the waste to the exporter or another facility in the United States?, and <u>40 CFR 262.54(g)(2)</u> | — | — | <u>X</u> |
| (c) Instruct the transporter to revise the manifest in accordance with exporter instructions? <u>40 CFR 262.54(g)(3)</u> | — | — | <u>X</u> |
| (6) Has the exporter received a copy of the EPA Acknowledgement of Consent (AOC) before shipment, and has the exporter shipped waste only within 12 months of receiving the AOC? | <u>X</u> | — | — |
| (7) Has the exporter attached a copy of the EPA AOC to the manifest accompanying shipment? <u>40 CFR 262.54(h)</u> | <u>X</u> | — | — |
| (8) Has the exporter provided the transporter with an additional copy of the manifest for delivery to the U.S. Customs Official at the point the hazardous waste leaves the United States? <u>40 CFR 262.54(i)</u> | <u>X</u> | — | — |

RECORDKEEPING REQUIREMENTS:

| | <u>OK</u> | <u>DF</u> | <u>NA</u> |
|---|------------|-----------|-----------|
| (A) <u>IMPORTER REQUIREMENTS:</u> | | | |
| (1) Has the importer retained at the facility a copy of the manifest and shipping paper (if signed in lieu of the manifest at the time of delivery) for at least three years? <u>40 CFR 264/265.71(b)(5)</u> | — | — | <u>X</u> |
| (B) <u>EXPORTER REQUIREMENTS:*</u> | | | |
| (1) Has the exporter kept a copy of each notification of intent to export for three years from the date waste was accepted by the initial transporter? <u>40 cFR 262.57(a)(1)</u> | <u>X**</u> | — | — |
| (2) Has the exporter kept a copy of each EPA Acknowledgement of Consent for three years from the date waste was accepted by the initial transporter? <u>40 CFR 262.57(a)(2)</u> | <u>X**</u> | — | — |
| (3) Has the exporter kept a copy of each Confirmation of Delivery for three years from the date waste was accepted by the initial transporter? <u>40 CFR 262.57(a)(3)</u> | <u>X**</u> | — | — |
| (4) Has the exporter kept a copy of each annual report for three years from the date waste was accepted by the initial transporter? <u>40 CFR 262.57(a)(4)</u> | <u>X**</u> | — | — |

*Note: The periods of records retention referred to in this section are extended automatically during the course of any unresolved enforcement action.

**The facility has been exporting wastewater sludge to Laidlaw Environmental Services, Limited, since 1991; the facility had the appropriate records for 1991 and 1992.

PART III

SUPPORTING EVIDENCE

- **EPA LETTER REGARDING TSD NOTIFICATION**
- **NOTIFICATION OF INTENT TO EXPORT**
- **EPA ACKNOWLEDGEMENT OF CONSENT**
- **MANIFESTS LISTING K051 WASTE CODE**
- **PHOTOCOPIES OF FIELD LOGBOOK**

EPA LETTER REGARDING TSD NOTIFICATION



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY

REGION V
230 SOUTH DEARBORN ST
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

BLUM SYDNEY CIVIC AFFAIR COUPD
MARATHON OIL COMPANY
1300 S FORT
DETROIT MI 48217
FACILITY: 1300 S FORT
LOCATION: DETROIT MI 48217
ID NO.: MID005506357

RE: TSD Notification without
Part A Application

Dear Notifier:

The United States Environmental Protection Agency (U.S. EPA) has received your notification of hazardous waste activity. On that form, by checking the "treat/store/dispose" (TSD) box, you indicated that you are a hazardous waste management facility (HWMF). To date, however, we have no record of having received Part A application for a hazardous waste permit which is required for all HWMFs.

Federal regulations require owners and operators of existing HWMFs (installations which treat, store, or dispose of hazardous waste) to have submitted a Part A permit application to the Regional Administrator by November 19, 1980, in accordance with 40 CFR 122.22. This requirement applied to HWMFs which were in existence on or before November 19, 1980. New facilities (those established after November 19, 1980) are required to submit Part A and Part B of their permit application, and receive a Resource Conservation and Recovery Act (RCRA) permit before beginning physical construction.

If your facility treats, stores, or disposes of hazardous waste, then your facility is operating without a hazardous waste permit, in violation of Section 3005 of RCRA, as amended. This violation is considered serious by the U.S. EPA, and may subject you to Federal enforcement under Section 3008 of RCRA for past and continued non-compliance.

Please submit your completed Part A application to the address below within fifteen days of receipt of this letter:

RCRA ACTIVITIES
P. O. Box A3587
Chicago, Illinois 60690-3587

We are aware that some hazardous waste handlers may have marked the TSD box on the notification form as a precaution or as a result of misunderstanding the May 19, 1980, hazardous waste regulations. If you notified us as a TSD in error, or if your status as a treatment, storage, or disposal facility has changed, please advise us in writing immediately.

Please contact Arthur Kawatachi of my staff at (312) 353-2197, if you have any questions regarding this letter.

Sincerely yours,

William H. Miner, Jr.
Karl J. Klepitsch, Jr., Chief
Waste Management Branch

NOTIFICATION OF INTENT TO EXPORT

Michigan Refining Division



**Marathon
Oil Company**

1300 South Fort Street
Detroit, Michigan 48217-1294
Telephone 313/843-9100

Certified Mail
Return Receipt #P 507 787 685

January 27, 1992

U.S. Environmental Protection Agency
Office of International Activities (A-106)
401 M. Street S.W.
Washington, D.C. 20460

RE: Notification of Intent to Export

To Whom It May Concern:

The attached notification forms are being submitted by Marathon Oil Company pursuant to the requirements of 40 CFR 262.53.

Please contact me at 313-843-9100 if you have any questions or require additional information.

Sincerely,

Jeffery L. Bruestle
Advanced Environmental Engineer

JLB/sjb
Attachments

Title 40, CFR, Part 262, Subpart E, Section 262.53
INTERNATIONAL SHIPMENTS

Date: 1-27-92

Office of International Activities (A-106)
E.P.A., 401 M. Street S.W.
Washington, D.C. 20460

Attention: Notification to Export

Our facility (exporter) name: Marathon Oil Company
Address: 1300 South Fort Street, Detroit, MI 48217
Phone: (313) 843-9100 E.P.A. #: MID 005506357

intends to use (Consignee) name: Laidlaw Environmental Services (Sarnia) Ltd.
Address: RR #1 Telfer Side Road, Corunna, Ontario N0N 1G0
E.P.A. I.D. #: MIT 270019904

to dispose of the following hazardous waste for the 12 month period beginning on the date that Canada expresses no objection. The waste involved is:

| Description of Waste | EPA Hazardous Waste No. | DOT Shipping Name | Hazardous Class | I.D. # (UN/NA) |
|-----------------------------|-------------------------|--|-----------------|----------------|
| Wastewater Treatment Sludge | K051 F037 | RQ Hazardous Waste Liquid N.O.S. (K051) | ORME | NA 9189 |

Frequency: 8 X 15 tonnes shipment(s) per year
(number) (volume & units) (day/week/quarter/year)

Estimated total quantity of hazardous waste shipped for the 12-month period is:
120 tonnes
(Units/U.S. Gals/Cu. Yds./Lbs./Tons)

The point of entry into Canada will be: Sarnia Ontario
City Province
The point of departure from U.S. will be: Pt. Huron Michigan
City State

Each shipment of hazardous waste will be transported by: Laidlaw Environmental Services Ltd. R.R. #1 Telfer Side Rd., Corunna, Ontario, N0N 1G0
EPA transporter No.: MIT 270019904

Via: Highway in Tank Trucks
(Mode/Air/Highway/Rail/Water) (Drums/Boxes/Tank/Bulk)

The waste listed above will be disposed of in the following manner:
(eg: ~~XXXXXX~~ Land Disposal ~~XXXXXX~~) and conforms to the appended Ontario Ministry of the Environment, Acknowledgement of Subject Waste Registration, Schedule A.

Exporter Larry M. Echelberger [Signature] Division Manager 1/28/92
Representative (Type Name) (Signature) (Title) (Date)

c.c. M.A. LaRocque, Laidlaw Environmental (Sarnia) Services Ltd., 265 N. Front Street, Sarnia, Ontario, N7T 7X1

Provincial M.O.E. Waste Class: 251-H
(3 D i g i t s -- 1 L e t t e r)

- 4 -

SCHEDULE "A"

This attached Schedule forms part of the acknowledgement of generator registration for the facility and site identified by Generator Registration Number MID005506357, dated at Toronto.

DEC 21 1990

| | Waste Stream | Waste Class |
|----|--|-------------|
| 1. | Oil/water separator sludge | 251H |
| 2. | Solid waste oil/water separator sludge | 251H |

Waste Management Branch Reviewer: *J. Armiento*
J. Armiento

EPA ACKNOWLEDGEMENT OF CONSENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

March 6, 1992

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

EPA Notice No.: 149/92

MR. LARRY M. ECHELBERGER
MARATHON OIL COMPANY
1300 SOUTH FORT STREET
DETROIT, MI 48217
EPA ID No.: MID005506357

Dear MR. ECHELBERGER:

This is to acknowledge receipt of your notice, dated January 27, 1992, of intent to export hazardous waste to Canada as required by Title 40, Code of Federal Regulations, Part 262, Subpart E, Section 262.53 promulgated pursuant to the Resource Conservation and Recovery Act (RCRA). In accordance with the U.S.-Canada Bilateral Agreement on the Transboundary Movement of Hazardous Waste, the U.S. Environmental Protection Agency (EPA) forwarded your notice to the Government of Canada and Canada has no objection to your shipment(s) of hazardous waste.

This letter constitutes the EPA Acknowledgment of Consent for the export of the following hazardous waste(s) as specified in your notice:

Waste Stream No.: 1

Waste Description: WASTEWATER TREATMENT SLUDGE. EPA
Waste Code: K051,F037. DOT Shipping Name: HAZARDOUS
WASTE, LIQUID, NOS; DOT Hazard Class: ORM-E; DOT I.D.
No.: NA9189. Total Volume to be Exported: 120 TONS.
Estimated Frequency: 8 loads per YEAR.

Waste Stream No.: 2

Waste Description: WASTEWATER TREATMENT SLUDGE. EPA
Waste Code: K051,F037. DOT Shipping Name: HAZARDOUS
WASTE, SOLID, NOS; DOT Hazard Class: ORM-E; DOT I.D.
No.: NA9189. Total Volume to be Exported: 495 TONS.
Estimated Frequency: 33 loads per YEAR.

You may ship these wastes to the following consignee:

LAIDLAW ENVIRONMENTAL SERVICES (SARNIA)
RR#1
CORUNNA, ONTARIO
CANADA N0N 1G0
EPA ID No.: MIT270019904

Shipments may occur during the period from February 19, 1992 to February 18, 1993.

You are also reminded of the following special RCRA requirements for export shipments of hazardous waste. Specific details of these requirements are contained in Title 40 of the Code of Federal Regulations, Part 262, Subpart E.

1. If the major terms of the original notice of intent to export on which this consent is based should change, you must renotify EPA. Please send your renotification to: EPA, Office of Waste Programs Enforcement, RCRA Enforcement Division (OS-520), 401 M Street, S.W., Washington, D.C. 20460, with "ATTENTION: NOTIFICATION TO EXPORT" prominently displayed on the front of the envelope. (262.53(c))
2. The Uniform Hazardous Waste Manifest Form for each shipment must identify the point of departure from the United States in Item 15, Special Handling Instructions. (262.54(c))
3. The following statement must be added to the end of the first sentence of the certification set forth in Item 16 of the Uniform Hazardous Waste Manifest Form: "and conforms to the terms of the attached EPA Acknowledgment of Consent". (262.54(d))
4. A copy of this Acknowledgment of Consent must be attached to the U.S. hazardous waste manifest that accompanies each shipment of hazardous waste. (262.54(h))
5. You must provide the waste transporter with an additional copy of the U.S. hazardous waste manifest accompanying the shipment for delivery to a U.S. Customs official at the point the hazardous waste leaves the United States in accordance with 263.20(g)(4). (262.54(i)).
6. You must file an exception report with the EPA, Office of Waste Programs Enforcement, RCRA Enforcement Division (OS-520), 401 M Street, S.W., Washington, DC 20460, Attn: NOTIFICATION TO EXPORT, if you have not received a copy of the manifest signed by the transporter stating the date and place of departure from the U.S. within forty five (45) days from the date it was accepted by the initial transporter; if within ninety (90) days from the date the waste was accepted by the initial transporter, the primary exporter has not received written confirmation from the consignee

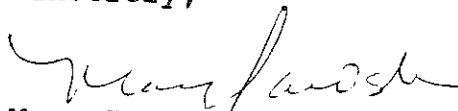
that the hazardous waste was received; or if the waste is returned to the United States. (262.55).

7. You must file an annual report by March 1 of each year with the EPA, Office of Waste Programs Enforcement, RCRA Enforcement Division (OS-520), 401 M Street, S.W., Washington, DC 20460, Attn: NOTIFICATION TO EXPORT, summarizing all hazardous waste shipments exported during the previous calendar year. The report must include all items listed in 262.56.

All shipments of hazardous waste must conform to all applicable State and Federal hazardous waste regulations and transportation requirements as well as these specific export requirements.

Any questions you may have concerning this Acknowledgment of Consent or other export requirements may be directed to Ms. Lisa Warner, EPA Office of Waste Programs Enforcement (Phone 202/260-9316) or to Mr. Jim Vincent, EPA National Enforcement Investigations Center (Phone 303/236-5120).

Sincerely,



Mary Jean Osborne, Chief
Policy Analysis and Coordination Section
RCRA Enforcement Division (OS-520)

cc: Jim Vincent, EPA/NEIC

MANIFESTS LISTING K051 WASTE CODE

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE

ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Failure to file is punishable under
section 299.546 MCL or Section 10 of
Act 136, P.A. 1969.

Please print or type:

Form Approved OMB No. 2050-C039 Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.

Manifest
Document No.

2. Page 1
of 1

Information in the shaded areas
is not required by Federal
law

3. Generator's Name and Mailing Address

Marathon Oil Company
1300 South Fort Street
Detroit, MI 48217 313 843-9100

4. Generator's Phone

5. Transporter 1 Company Name

Laidlaw Environmental Services

6. US EPA ID Number

MI T 277 001 990 4

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address

Laidlaw Environmental Services (Serbia) Ltd.
RR #1, Telfer Side Road
Corunna, Ontario N0M 1B0

10. US EPA ID Number

MI T 277 001 990 4

11. US DOT Description (including Proper Shipping Name, Hazard Class, and
HM ID NUMBER).

12. Containers

13. Total
Quantity

14. Unit
M/Vol

1. Waste
No.

a. **X** **HAZARDOUS Waste Liquid H.O.S.**
(1061) ORN-E HA 9189

No.

Type

Quantity

Unit

Waste

| a. | b. | c. | d. | No. | Type | Quantity | Unit | Waste |
|----|----|----|----|-----|------|----------|------|-------|
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |

J. Additional Description (For Materials Listed Above)

This waste is subject to the provisions of the Emergency Response Act of 1991.

K. Handling Code for Wastes
Entered Above

a. **1**
b. **1**
c. **1**
d. **1**

15. Special Handling Instructions and Additional Information

Port Huron, MI. For emergency contact CHEMTREC 1-800-424-9300

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

EPA Acknowledgement of consent and conforms to the terms of the attached

I hereby certify that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Signature

Date
Month Day Year

C. Tyme

[Signature]

02-11-92

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date
Month Day Year

02-11-92

[Signature]

02-11-92

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date
Month Day Year

02-11-92

[Signature]

02-11-92

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Signature

Date
Month Day Year

J. C. [Signature]

[Signature]

02-11-92

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE

ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Failure to file this manifest under section 298.548 MCL or Section 10 of Act 136, P.A. 1969.

Please print or type.

Form Approved, OMB No. 2050-0039 Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.

Manifest
Document No.

2. Page 1
of 1

Information in the shaded areas
is not required by Federal
law

3. Generator's Name and Mailing Address

Marathon Oil Company
1300 South Fort Street
Detroit, MI 48217 (313) 843-9100

4. Generator's Phone ()

5. Transporter 1 Company Name

Laidlaw Environmental Services

6. US EPA ID Number

MI T 270019904

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address

Laidlaw Environmental Services (Sarnia) Ltd.
RR #1, Telfer Side Road
Corunna, ON N0N-1G0

10. US EPA ID Number

MI T 270019904

C. State Transporter's ID

D. Transporter's Phone

E. State Transporter's ID

F. Transporter's Phone

G. State Facility's ID

H. Facility's Phone

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).

12. Containers

13. Total
Quantity

14. Unit
Wt/Vol

a. **X** **RQ Hazardous Waste Solid H.O.S.**
(K061) ORN-E NA 9189

No. Type

001 CN

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J. Additional Descriptions for Materials Listed Above

This waste is subject to the Hazardous Waste Regulations in 40CFR 260.41 and 260.43 for HQ1 hazardous waste. Emergency response guide 151 attached.

K. Handling Codes for Wastes Listed Above

a. **1**
b. **1**
c. **1**
d. **1**

15. Special Handling Instructions and Additional Information

Point of departure from U.S. will be Port Huron, Michigan. For emergency, contact CHEMTREC 1-800-424-9300

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. **and conforms to the terms of the attached EPA acknowledgment of consent.**

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Signature

Date
Month Day Year

06 02

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date
Month Day Year

06 02

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name

Signature

Date
Month Day Year

06 02

19. Discrepancy Indication Space

20. Facility Owner or Operator. Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Signature

Date
Month Day Year

06 02

DNR
MICHIGAN DEPARTMENT
OF NATURAL RESOURCES

ATT. ☐ ☐

Please print or type.

**UNIFORM HAZARDOUS
WASTE MANIFEST**

1. Generator's US EPA ID No.

MI 000550011700

3. Generator's Name and Mailing Address

Marathon Oil Company
1300 South Fort Street

4. **Detroit, MI 48217** - (313) 843-9100

5. Transporter 1 Company Name

6. US EPA ID Number

Laidlaw Environmental Services

MIT 270019904

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address

10. US EPA ID Number

Laidlaw Environmental Services (Sarnia) Ltd.
RR #1, Talfer Side Road
Corunna, ON N0M-1S0

MIT 270019904

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).

12. Containers

13. Total Quantity

14. Unit Wt/Vol

1. Waste No.

a. **RQ Hazardous Waste Solid H.O.S.**
X (E051) ORM-E RA 9189

No. Type

0016

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15. Special Handling Instructions and Additional Information.

Point of departure from U.S. will be Port Huron.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

EPA Actuated generator or transporter and confirm to the terms of the attached. I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Signature

Date

Month Day Year

05 22 92

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17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

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19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Signature

Date

Month Day Year

05 22 92

Month Day Year

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Month Day Year

05 22 92

Month Day Year

DNR **MICHIGAN DEPARTMENT** **OF NATURAL RESOURCES**

DO NOT WRITE IN THIS SPACE

ATT. ☐ DIS. ☐ REJ. ☐ PR ☐

Required under authority of Act 64, P.A. 1979, as amended and Act 136, P.A. 1989.

Failure to file is punishable under section 299.548 MCL or Section 10 of Act 136, P.A. 1969.

Please print or type.

Form Approved OMB No. 2050-0039 Expires 9-30-91

| | | | | | | | | | | | | | | | |
|---|--|--|--|--|--|---|--|---|--|--------------------------------------|--|--------------|--|-----|--|
| UNIFORM HAZARDOUS WASTE MANIFEST | | 1. Generator's US EPA ID No. MI 00055063570001 | | Manifest Document No. MI 1749835 | | 2. Page 1 of 1 | | Information in the shaded areas is not required by Federal law. | | | | | | | |
| 3. Generator's Name and Mailing Address Marathon Oil Company 1300 South Fort Street Detroit, MI 48217 313 843-9100 | | | | | | A. State Manifest Document Number MI 1749835 | | | | | | | | | |
| 4. Generator's Phone () 313 843-9100 | | | | | | B. State Generator's ID | | | | | | | | | |
| 5. Transporter 1 Company Name Laidlaw Environmental Services | | | | 6. US EPA ID Number MI T270010904 | | C. State Transporter's ID | | | | | | | | | |
| 7. Transporter 2 Company Name | | | | 8. US EPA ID Number | | D. Transporter's Phone 510-964-1201 | | | | | | | | | |
| 9. Designated Facility Name and Site Address Laidlaw Environmental Services (Sarnia) Ltd. RR #1, Telfer Side Road Corunna, Ontario N0M 1G0 | | | | 10. US EPA ID Number MI T270010904 | | E. State Transporter's ID | | | | | | | | | |
| | | | | | | F. Transporter's Phone | | | | | | | | | |
| | | | | | | G. State Facility's ID | | | | | | | | | |
| | | | | | | H. Facility's Phone 510-964-1021 | | | | | | | | | |
| 11. US DOT Description (including Proper Shipping Name, Hazard Class, and HM ID NUMBER). | | | | | | 12. Containers | | 13. Total Quantity | | 14. Unit Wt/Vol | | I. Waste No. | | N/A | |
| a. X RQ Hazardous Waste Liquid N.O.S. (K051) ORN-E NA 9189 | | | | | | No. Type | | | | | | | | | |
| b. | | | | | | | | | | | | | | | |
| c. | | | | | | | | | | | | | | | |
| d. | | | | | | | | | | | | | | | |
| J. Additional Descriptions for Materials Listed Above This waste is subject to the land disposal restrictions in 40CFR 268.41 and 268.43 for K051 nonhazardous materials. Emergency response guide #31 attached. | | | | | | K. Handling Codes for Wastes Listed Above a/ / b/ / c/ / d/ / | | | | | | | | | |
| 15. Special Handling Instructions and Additional Information Port Huron, MI. For emergency contact CHEMTREC 1-800-424-9300 | | | | | | | | | | Point of departure from U.S. will be | | | | | |
| 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. | | | | | | | | | | | | | | | |
| EPA Acknowledgement of consent and conforms to the terms of the attached | | | | | | | | | | | | | | | |
| I have a large quantity of waste and have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. | | | | | | | | | | | | | | | |
| Printed/Typed Name C. Tyne | | | | | | | | | | Signature <i>[Signature]</i> | | | | | |
| Date 03/11/02 | | | | | | | | | | Month Day Year | | | | | |
| 17. Transporter 1 Acknowledgement of Receipt of Materials | | | | | | | | | | Date 03/11/02 | | | | | |
| Printed/Typed Name | | | | | | | | | | Signature <i>[Signature]</i> | | | | | |
| Date 03/11/02 | | | | | | | | | | Month Day Year | | | | | |
| 18. Transporter 2 Acknowledgement of Receipt of Materials | | | | | | | | | | Date 03/11/02 | | | | | |
| Printed/Typed Name | | | | | | | | | | Signature <i>[Signature]</i> | | | | | |
| Date 03/11/02 | | | | | | | | | | Month Day Year | | | | | |
| 19. Discrepancy Indication Space | | | | | | | | | | | | | | | |
| 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. | | | | | | | | | | | | | | | |
| Printed/Typed Name | | | | | | | | | | Signature <i>[Signature]</i> | | | | | |
| Date 03/11/02 | | | | | | | | | | Month Day Year | | | | | |



**MICHIGAN DEPARTMENT
OF NATURAL RESOURCES**

DO NOT WRITE IN THIS SPACE

ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Act 64, P.A. 1979, as amended and Act 136, P.A. 1989.
Failure to file is punishable under section 299.548 MCL or Section 10 of Act 136, P.A. 1989.

Please print or type

Form Approved OMB No. 2050-0039 Expires 9-30-91

**UNIFORM HAZARDOUS
WASTE MANIFEST**

1. Generator's US EPA ID No.

Manifest
Document No.

2. Page 1
of 1

Information in the shaded areas
is not required by Federal
law.

3. Generator's Name and Mailing Address

**Marathon Oil Company
1300 South Fort Street**

4. Detroit, MI (one 48217) - (313) 843-9100

5. Transporter 1 Company Name

Laidlaw Environmental Services

7. Transporter 2 Company Name

6. US EPA ID Number

8. US EPA ID Number

A. State Manifest Document Number

MI 1749836

B. State Generator's ID

C. State Transporter's ID

D. Transporter's Phone 519-864-1201

E. State Transporter's ID

F. Transporter's Phone

G. State Facility's ID

H. Facility's Phone

519-864-1201

9. Designated Facility Name and Site Address

**Laidlaw Environmental Services (Sarnia) Ltd.
RR #1, Telfer Side Road
Corunna, ON N0N-1G0**

10. US EPA ID Number

MI T 270019904

11. US DOT Description (including Proper Shipping Name, Hazard Class, and
HM ID NUMBER)

12. Containers

13. Total
Quantity

14. Unit
Wt/Vol

I. Waste
No.

N/H

a. **HQ Hazardous Waste Solid N.O.S.
X (RD51) ORM-E NA 9189**

No. Type

001 SN

37000 P

RD51

N

J. Additional Descriptions for Materials Listed Above

**This waste is subject to the land disposal restrictions
in 40CFR 268.41 and 268.43 for RD51 nonhazardous.
Emergency response guide #31 attached.**

K. Handling Codes for Wastes
Listed Above

a/ /

b/ /

c/ /

d/ /

15. Special Handling Instructions and Additional Information

**Point of departure from U.S. will be Port Huron,
Michigan. For emergency, contact CHEMTREC 1-800-424-9300.**

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by
proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway
according to applicable international and national government regulations.

EPA Acknowledgment: I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined
to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the
present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste
generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Signature

Date
Month Day Year

05 22 92

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

05 22 92

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

05 22 92

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in
Item 19.

Printed/Typed Name

Signature

Date
Month Day Year

05 22 92



**MICHIGAN DEPARTMENT
OF NATURAL RESOURCES**

DO NOT WRITE IN THIS SPACE

ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Act 64, P.A. 1979, as amended and Act 136, P.A. 1969.

Failure to file is punishable under section 299.548 MCL or Section 10 of Act 136, P.A. 1969.

Please print or type

Form Approved OMB No. 2050-0039 Expires 9-30-91

| UNIFORM HAZARDOUS WASTE MANIFEST | | 1. Generator's US EPA ID No. | Manifest Document No. | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law. |
|--|--|--|-----------------------|--|---|
| 3. Generator's Name and Mailing Address Marathon Oil Company 1300 South Fort Street Detroit, MI 48217 (313) 843-9100 | | 4. Generator's Phone | | A. State Manifest Document Number MI 1749837 | |
| 5. Transporter 1 Company Name Laidlaw Environmental Services | | 6. US EPA ID Number MI T270019904 | | B. State Generator's ID | |
| 7. Transporter 2 Company Name | | 8. US EPA ID Number | | C. State Transporter's ID | |
| 9. Designated Facility Name and Site Address Laidlaw Environmental Services (Sarala) Ltd. RR #1, Telfer Side Road Corunna, OH 48801-160 | | 10. US EPA ID Number MI T270019904 | | D. Transporter's Phone 519-864-1201 | |
| | | | | E. State Transporter's ID | |
| | | | | F. Transporter's Phone | |
| | | | | G. State Facility's ID | |
| | | | | H. Facility's Phone 519-864-1021 | |
| 11. US DOT Description (including Proper Shipping Name, Hazard Class, and HM) | | 12. Containers | | 13. Total Quantity | 14. Unit Mt/Vol |
| a. X RQ Hazardous Waste Solid H.O.S. (K051) ORM-E NA 9189 | | No. Type | | | |
| b. | | | | | |
| c. | | | | | |
| d. | | | | | |
| J. Additional Descriptions for Materials Listed Above This waste is subject to the land disposal restrictions in 40CFR 26841 and 26843 for K051 nonwater-soluble. Emergency response guide #31 attached. | | K. Handling Codes for Wastes Listed Above | | a/ / b/ / c/ / d/ / | |
| 15. Special Handling Instructions and Additional Information Point of departure from U.S. will be Port Huron, Michigan. For emergency, contact CHEMTREC 1-800-424-9300 | | | | | |
| 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. EPA acknowledgment of consent and conforms to the terms of the attached If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. | | | | | |
| Printed/Typed Name | | Signature | | Date Month Day Year | |
| 17. Transporter 1 Acknowledgement of Receipt of Materials | | Signature | | Date Month Day Year | |
| Printed/Typed Name | | Signature | | Date Month Day Year | |
| 18. Transporter 2 Acknowledgement or Receipt of Materials | | Signature | | Date Month Day Year | |
| Printed/Typed Name | | Signature | | Date Month Day Year | |
| 19. Discrepancy Indication Space | | | | | |
| 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. | | | | | |
| Printed/Typed Name | | Signature | | Date Month Day Year | |

PHOTOCOPIES OF FIELD LOGBOOK

7/29/92

①

Sunny, Cool 78°F

10:45 Gina L. Culseth and
Mary Joyce Finkbeiner - PRC
on site at Marathon
Oil Company

11:10a Met with Jeff Brevette
and Brian Vandettoff of
with ^{PRC} Marathon Oil Co.

Refining of crude oil

gasoline

fuel oil

propane

propylene

asphalt

sulfur

API wastewater sludge

KSPM/KOSI

TS

R

(2)

7/29/92

Have been exporting since

1990

~~Taylor~~ Laidlaw

Environmental Services

in ~~Green~~ Corona,

Ontario

RR #1, Tiffin Side Road

495 Tons

120 Tons

1991

401,400 lbs

201 Tons

~~West~~ Sludge

~~West~~ Sludge

KOS 1

ES37 - other wastewater sludges -

new for 1992

7/29/92

(3)

Marathon has not shipped
off any ES37 waste this
year (1992).

Issue: ~~Mar~~ ^{WFE} off site that
Marathon O.I. Company
is a generator only and
not a TSD facility.

11:20

May F. and Gina G.

receiving manifests
for exporting of the
KOS 1 waste

Made copies of 1992 manifests,
documentation and approval
of disposal of KOS 1
wastes at Laidlaw

(4)

7/29/92

Made copy of original
hazardous waste notification
form that has Marathon
as a TSD.

11:50

Discussed outstanding
issues - COR Documentation
forms and status
of the facility - either
a TSD or generator
only with Jeff Brester
of Marathon

12:10

off-site

7/29/92

(5)

May Joyce Lambert and
Gina E. Gubeth arrived
at AJAX Metal Processing,
Inc.

Met with Gregory J.
Wronkiewicz

Discussing past history
of AJAX

AJAX has been at its
current location since 1974.

AJAX electropolates and
heat treat various steel
part.

WJL 7/29/92

MID 005 506 357

Michigan Refining Division



**Marathon
Petroleum Company**

1300 South Fort Street
Detroit, Michigan 48217-1294
Telephone 313/843-9100

February 5, 1988

Ms. Shirlee Brauer
U. S. EPA Region V
RCRA Enforcement Section
5HE-12
230 South Dearborn Street
Chicago, Illinois 60604

Dear Ms. Brauer:

Pursuant to our telephone conversation yesterday, I have enclosed the signed certification.

In reviewing the situation, our Findlay Headquarters mailed you a signed certification in May, 1987 and it was assumed by the Detroit Refinery that what they sent to you was sufficient. Please accept our apology for any inconvenience this may have caused your department.

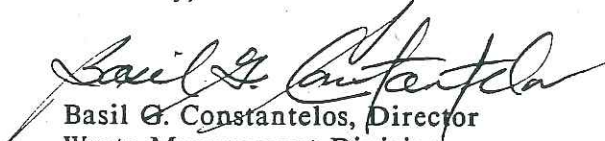
Sincerely,


Sydney Blum
Civic Affairs Coordinator

SB:jmm
attachment

All responses should be sent to Ms. Shirlee Brauer, U.S. EPA Region V, RCRA Enforcement Section, 5HE-12, 230 South Dearborn Street, Chicago, Illinois 60604. Questions may be directed to the RCRA/Superfund Hotline at (800) 424-9346 or to either Ms. Brauer at (312) 886-4591 or Ms. Laura Lodisio at (312) 886-7090.

Sincerely,


Basil G. Constantelos, Director
Waste Management Division

Enclosure

After reviewing the information provided, I certify that I am not a marketer or burner of waste-as-fuel and that I do not generate hazardous waste used to produce a fuel. Therefore, I am not subject to the regulations finalized on November 29, 1985, which are codified in 40 CFR Part 266, Subparts D and E. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature

Name and Official Title

Date Signed



Sydney Blum
Civic Affairs Coordinator

February 5, 1988

NOV 06 1990

NOV 06 1990

5HR-13

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Marathon Petroleum Co.
1300 South Fort
Detroit, Michigan 48217

Re: Marathon Petroleum Co.
MID 005 506 357

Dear Sir or Madam:

The purpose of this letter is to inform you of the November 7, 1990, date of the expiration of the national capacity variance for petroleum refinery wastes, K048-K052. As you are aware under the Third Third rule, EPA granted an additional three-month national capacity variance for these wastes (55 FR 22641, June 1, 1990). The variance expires on November 7, 1990.

As of November 8, 1990, you, as the generator of these wastes, must treat the K048-K052 wastes to BDAT standards prior to land disposal, unless one of these three situations exists:

1. You have received final approval for a case-by-case extension (RCRA Section 3004(h)(3) and 40 CFR 268.5) as published in the Federal Register, or
2. You have received final approval for a "no-migration" variance (40 CFR 268.6) as published in the Federal Register, or
3. You or the treatment facility has received a treatability variance (40 CFR 268.44) for the particular waste stream(s).

The Agency anticipates that it will not issue any final decisions on any petitions for variances or extensions prior to November 8, 1990. During the period of the national capacity variance, you should have been exploring and implementing alternatives to the land disposal of untreated K048-K052 wastes.

The Agency is committed to carrying out the mandate established by Congress in RCRA Section 3004 of the Hazardous and Solid Waste Amendments of 1984. We will be conducting inspections and taking subsequent enforcement actions appropriate to the nature of the violations relating to the Land Disposal

Restrictions regulations soon after the November 8, 1990, date. We strongly advise you to take any necessary steps to be in compliance with these important requirements on the effective date.

Sincerely yours,

ORIGINAL SIGNED BY/
KARL BREMER

William E. Muno
Acting Associate Director
Office of RCRA

cc: Alan Howard
Michigan Department of Natural Resources

| INIT. DATE | TYP. | AUTH. | IL/IN TECH. ENF. SEC. | MI/WI TECH. ENF. SEC. | OH/MN TECH. ENF. SEC. | IL/MI/WI ENF. PROG. SECTION | IN/MN/OH ENF. PROG. SECTION | RCRA ENF. BR. CHIEF | O. R. A.D.D. | WMD DIR |
|---------------|------|-------|-----------------------------|-----------------------------|-----------------------------|-----------------------------------|-----------------------------------|---|----------------------|------------|
| | | | | | | | SKS 11-6-90 | <i>AKH/11/90</i> <i>W</i> 11-6-90 | <i>ew</i> 11-6-90 | |

| INIT. DATE | TYP. | OTHER | OTHER | SECT | SECT | SECT | SECT |
|----------------------|------|-------|-------|------|------|------|------|
| <i>Br</i> 11/5/90 | | | | | | | |

INSPECTION AND ENFORCEMENT REVIEW/STATUS

ID # MID 005 506 357FACILITY NAME Marathon Petroleum CoLOCATION Detroit, MI

COMPLIANCE STATUS: IN OUT
 VIOLATION CLASS: I II III
 G T TSD
 REVIEWER:
 DATE:

INSPECTION REVIEW

| ACTION ITEM | STRT DATE | END DATE | RPT COMP | STAT CODE | RESP AGCY | RESP PERS | COMM | FREE PLDS | TYPE INSP | PART AGCY | LINK |
|----------------|--------------|-------------|-------------|--------------|--------------|--------------|------|--------------|--------------|--------------|------|
| 1 | 830926 | 830926 | 831014 | 5 | | | | | N | | |

ENFORCEMENT ACTIONS

| ACTION ITEM | DATE ISUD | DATE DUE | DATE RECD | STAT CODE | STAT DATE | RESP AGCY | RESP PERS | COMM | FREE FLDS | PLTY ASSD | PLTY CLTD | DTHR COM | DTHR COMP | LINK |
|----------------|--------------|-------------|--------------|--------------|--------------|--------------|--------------|------|--------------|--------------|--------------|-------------|--------------|------|
| 3 | 830919 | 831121 | | X | 831014 | S | | | M | | | | | |

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
VENE J. FLUHARTY
PHEN V. MONSMA
O. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

David F. Hales, Director

S.E. MICHIGAN FIELD OFFICE
Waste Management
505 W. Main
Northville, MI 48167

December 20, 1988

*In-Compliance
CB.*

Marathon Petroleum Company
1300 S. Fort Street
Detroit, MI 48217-1294
Attn: Mr. Jeffrey L. Bruestle

RE: MID005506357 ✓

Dear Mr. Bruestle:

On November 30, 1988, an inspection was conducted at your facility located at 1300 S. Fort Street, Detroit, MI. The purpose of the inspection was to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended; Michigan's Hazardous Waste Management Act, Act 64 of 1979, as amended; Michigan's Liquid Industrial Waste Hauling Act, Act 136, P.A. of 1969, as amended; and Land Disposal Restriction requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended.

I have determined that your facility has no deficiencies of the requirements in the areas reviewed during that inspection.

Thank you for your cooperation during my visit.

Sincerely,

A handwritten signature in cursive script, appearing to read "Faye Mitchell".

Faye Mitchell
Environmental Quality Analyst

FM:cm
cc: B. Okwumabua
Enclosure

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Marathon Petroleum Company

U.S. EPA I.D. No.: MI D 005506357

Street: 1300 S. Fort St

City: Detroit State: MI Zip Code: 48217

Telephone: 313-843-9100

Operator: Same

Street: _____

City: _____ State: _____ Zip Code: _____

Telephone: _____

Owner: Same

Street: _____

City: _____ State: _____ Zip Code: _____

Telephone: _____

Inspection Date: 11/30/88 Time: 9³⁰ - 11^{am} Weather Conditions: _____

Inspectors: Name Affiliation Telephone
Faye Mitchell, M.D.R., 313-344670

Facility Representatives: Jeffery Brustle
Sidney Blum

| | RCRA Status | F-Solvent | LDR Status California List | First Third |
|-------------|-------------|-----------|-------------------------------|------------------------------|
| Generator | <u>✓</u> | _____ | <u>✓</u> | <u>✓ (2 yr. maintenance)</u> |
| Transporter | _____ | _____ | _____ | _____ |
| Treater | _____ | _____ | _____ | _____ |
| Storer | _____ | _____ | _____ | _____ |
| Disposer | _____ | _____ | _____ | _____ |

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

____ Yes ____ No ☒ NA

If yes, check the appropriate treatability group.

- ____ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
____ Pharmaceutical wastewater containing spent methylene chloride
____ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste? *yes*

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

____ Yes ____ No ☒ NA

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))?

____ Yes ____ No ☒ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

3. First Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☒ Yes ☐ No ☒ NA

If yes, check the appropriate treatability group.

☐ Wastewater (less than 1% TOC by weight and less than 1% filterable solids)
☒ Nonwastewaters

List the waste code and check the correct treatment standard group.

| Waste Code | Wastewater | Nonwastewater |
|------------|----------------------|-------------------------------------|
| 0008 | | <input checked="" type="checkbox"/> |
| K052/51 | (not effective until | November 1990) |
| _____ | _____ | _____ |
| _____ | _____ | _____ |

B. Waste Analysis

1. F-Solvent Wastes

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

☐ Yes ☐ No ☒ NA

How was this determination made?

- Knowledge of waste

☐ Yes ☐ No

If yes, is any supporting data available for review? Describe how this is adequate. _____

- TCLP

☐ Yes ☐ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results. _____

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

_____ Yes _____ No _____ NA

If yes, specify the waste stream: _____

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

_____ Yes _____ No _____ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

2. California List Wastes

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846? *Liquid / Knowledge - free flowing*

_____ Yes _____ No _____ NA

- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

_____ Yes ☒ No _____ NA

What type of absorbent is used? _____

Check the types of waste to which absorbent is added.

_____ Liquid hazardous waste having a pH less than or equal to 2

_____ Liquid hazardous waste containing metals

_____ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

_____ Yes _____ No _____ NA

If yes, is any supporting data available for review? Describe how this is adequate. _____

- Testing ☐ Yes ☐ No ☐ NA

If yes, list test method used: _____

- d. Does the generator determine if concentration levels in the PFLT filtrate exceed cyanide and metals concentration levels?

☒ Yes ☐ No ☐ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: Total metals (561-846)
Pb = 1500 mg/l

- e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

☐ Yes ☒ No ☐ NA

3. First Third Wastes: **X**

- a. Does the generator correctly determine the appropriate treatment standard of the waste?

☐ Yes ☐ No ☐ NA

Note: The treatment standards for first third wastes are given in Appendix D.

- b. Does the generator determine whether the First Third waste exceeds treatment standards upon generation?

☐ Yes ☐ No ☐ Soft hammer

If yes, specify the waste stream: _____

How was this determination made?

- Knowledge of waste

☐ Yes ☐ No

If yes, is any supporting data available for review? Describe how this is adequate. _____

- TCLP

_____ Yes _____ No _____ NA

- Total Constituent Analysis

_____ Yes _____ No _____ NA

Provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- c. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

_____ Yes _____ No _____ NA

- d. How does the generator test the waste when a process or waste stream changes?

C. Management

1. On-Site Management

Is restrict waste or waste that exceeds the treatment standards treated, stored, or disposed on-site?

_____ Yes ☒ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

☒ Yes _____ No

- b. Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

☒ Yes _____ No

c. Does notification contain the following?

EPA Hazardous waste number(s) ☒ Yes ☐ No
 Applicable treatment standards ☒ Yes ☐ No
 Manifest number ☒ Yes ☐ No
 Waste analysis data, if available ☒ Yes ☐ No

Identify off-site treatment or storage facilities: Muhlenberg
Disposal, Belleville, NJ

d. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

☐ Yes ☒ No

~~e.~~ Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

☐ Yes ☐ No

~~f.~~ Does notification contain the following?

EPA Hazardous waste number(s) ☐ Yes ☐ No
 Applicable treatment standards ☐ Yes ☐ No
 Manifest number ☐ Yes ☐ No
 Waste analysis data, if available ☐ Yes ☐ No
 Certification that the waste meets treatment standards ☐ Yes ☐ No

Identify off-site land disposal facilities: _____

g. Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?

☒ Yes ☐ No ☐ NA

h. If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

☒ Yes ☐ No

- i. If yes, does the notification contain the following information?

EPA Hazardous waste number ☒ Yes ☐ No

The corresponding treatment standards and all applicable prohibitions ☒ Yes ☐ No

Manifest number ☒ Yes ☐ No

Waste analysis data, if available ☒ Yes ☐ No

Date the waste is subject to the prohibitions ☒ Yes ☐ No

- j. Does the generator retain copies of all notices and certifications for a period of 5 years?

☒ Yes ☐ No
as of Nov. 1988

D. Demonstration and Certification -- "Soft Hammer" Wastes

- a. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]? ☐ Yes ☐ No

- b. Has the generator submitted to the Regional Administration a demonstration and certification containing the following information to document its efforts to locate practically available treatment:

A list of facilities and facility officials contacted? ☐ Yes ☐ No

Addresses ☐ Yes ☐ No

Telephone Numbers ☐ Yes ☐ No

Contact dates ☐ Yes ☐ No

Attach a copy of the demonstration and certification

- c. If the generator has determined that there is no practically available treatment for its wastes, has it sent documentation to EPA demonstrating why it was not able to obtain treatment or recovery for the waste? ☐ Yes ☐ No

If yes, attach a copy of written discussion.

- d. Does the generator ship his waste off-site for treatment?

_____ Yes _____ No

Describe the type of treatment and treatment facilities _____

- e. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

_____ Yes _____ No

- f. Does the generator provide certification with each subsequent shipment of wastes?

_____ Yes _____ No

- g. Does the generator provide the following notification to the receiving facility with each shipment of waste?

(i) EPA Hazardous waste number _____ Yes _____ No

(ii) Manifest number _____ Yes _____ No

(iii) Waste analysis data, if available _____ Yes _____ No

- h. Does the generator retain copies of all notices, demonstrations, and certifications for a period of 5 years?

_____ Yes _____ No

E. Treatment Using RCRA 264/265 Exempt Units or Processes
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

_____ Yes _____ No

If yes, list types of waste treatment units and processes:

JAN 21 1993

HRE-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Jeff Bruestle
Marathon Oil Company
1300 South Fort Avenue
Detroit, Michigan 48217

Re: RCRA Compliance Inspection
Marathon Oil Company
EPA ID No.: MID 005 506 357

Dear Mr. Bruestle:

On July 29, 1992, your facility located in Detroit, Michigan was inspected by the United States Environmental Protection Agency's (U.S. EPA) representatives. The purpose of the inspection was to evaluate compliance with the requirements of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the import or export of hazardous waste. A copy of the inspection is enclosed for your reference.

Based on information provided by facility personnel and a review of records at the time of the investigation, it was determined that the facility exports hazardous waste. It was also determined that your facility was in compliance with the RCRA requirements evaluated at the time of the inspection. Compliance with these requirements does not limit the applicability of other provisions of the RCRA regulations.

If you have any questions and/or concerns regarding this matter, please contact Janet Haff of my staff at (312) 353-7923.

Sincerely yours,

ORIGINAL SIGNED BY
JOSEPH M. BOYLE

Joseph M. Boyle, Chief
RCRA Enforcement Branch

Enclosure

cc: JoAnn Merrick, MDNR-Lansing

bcc: Allen Wojtas, U.S. EPA
J.HAFF:ev:01/12/93:DISK #: FILE:jbryestle

| SIGNATURE/INITIAL CONCURRENCE REQUESTED - RCRA ENFORCEMENT BRANCH (REB) | | | | | | | | | |
|---|---------|-----------------------|-----------------------|-----------------------|--------------------------|--------------------------|------------------------|------------------------|-----------------------------|
| TYP. | AUTH | IL/IN TES CHIEF | MI/WI TES CHIEF | MN/OH TES CHIEF | IL/MI/WI EPS CHIEF | IN/MN/OH EPS CHIEF | REB BRANCH CHIEF | RCRA ASSOC. DIR. | WMD DIVISION DIRECTOR |
| 1-15-93 | 1-15-93 | | | | 1-19-93 | | 1-20-93 | | |



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF

5HE-12

1 FEB 1988

Marathon Petroleum Co. (Refining)
1300 S. Fort St.
Detroit, MI 48217

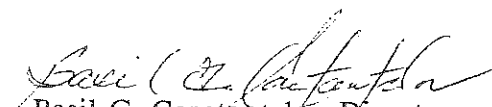
Re: Second Letter of Warning
Waste-As-Fuel Notification

This letter is to notify you that the United States Environmental Protection Agency (U.S. EPA) has not received your response to a Letter of Warning issued on April 17, 1987; a copy of this letter is enclosed. The letter required that you review all waste management activities conducted at your facility and, if applicable, submit a notification to the U.S. EPA of hazardous waste or used oil activities. If you are not a generator, marketer or burner of hazardous waste or used oil requiring notification, you were required to submit a signed certification to that effect. To date, neither response has been received from you by the U.S. EPA.

Please review the enclosed letter, and within thirty (30) days of this letter's date, submit either a completed Notification or signed certification. Be advised that Notification of hazardous waste and used oil activities is required pursuant to Section 3010 of the Resource Conservation and Recovery Act (RCRA). Failure to submit such notification, if required, is a violation of RCRA and may subject you to further enforcement action by this agency, including the assessment of a civil penalty of up to \$25,000 per day of violation.

All responses should be sent to Ms. Shirlee Brauer, U.S. EPA, Region V, RCRA Enforcement Section (5HE-12), 230 South Dearborn Street, Chicago, Illinois 60604. Questions may be directed to Ms. Brauer at (312) 886-4591 or Ms. Laura Lodisio at (312) 886-7090. If you need additional Notification forms and instructions, please contact the U.S. EPA, Region V, Identification Number Hotline at (312) 886-4001.

Sincerely,


Basil G. Constantelos, Director
Waste Management Division

Enclosure

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

JACOB A. HOEFER
ROBERT HOLMES
E. M. LAITALA
HILARY F. SNELL
PAUL H. WENDLER
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909
~~HOWARD K. KANNEKOR~~
Ronald Skoog, Director
Hazardous Waste Division
9311 Groh Road
Grosse Ile, Michigan 48138

October 31, 1983

Mr. Sydney Blum
Civic Affairs Coordinator
Marathon Oil Company
1300 South Fort Street
Detroit, Michigan 48217

Re: MID 005506357

Dear Mr. Blum:

Thank you for your letters of October 18 and October 27, 1983. Your responses appear to address the items of my October 19 letter quite satisfactorily. Thank you for your prompt and cooperative resolution of these violations.

Sincerely,

A handwritten signature in cursive script that reads "Susan Norton".

Susan Norton
Water Quality Specialist
Compliance Section
Hazardous Waste Division

SN/sc

cc: Hazardous Waste Division, Lansing (3)



**Marathon
Petroleum Company**

1300 South Fort Street
Detroit, Michigan 48217-1294
Telephone 313/843-9100

October 27, 1983

RECEIVED

Ms. Susan Norton
Water Quality Specialist
Compliance Section
Department of Natural Resources
9311 Groh Road
Grosse Ile, MI 48138

OCT 31 1983

WATER QUALITY DIV.
DIST. I

Dear Ms. Norton:

I received your letter dated October 19, 1983, reviewing the visit by you and Jim Scott concerning compliance with RCRA Subtitle "C" on September 26 and my follow-up visit to you on September 29. I was on vacation until October 25 so I could not respond to it until today.

I appreciate your comments about our generally high level of compliance and am responding to the questions you raised.

1. The generator second copy of Manifest MI 161635 was, in fact, missing. Chem-Met, our disposer, was called and furnished us a copy of the manifest, noting correct disposal of 7,000 gallons of API separator sludge (K051) on August 12, 1983. A copy of that manifest was mailed to you on October 18 and I trust that the action taken meets your requirement.
2. Enclosed is a list of home addresses and home and office phone numbers for all individuals qualified to act as emergency coordinator. We did have the home telephone numbers but not the addresses and this information will be included in our Emergency Control Plan.

If you desire anything further, please let me know.

Sincerely yours,


Sydney Blum
Civic Affairs Coordinator

vh
att.

EMERGENCY RESPONSE INDIVIDUALS

| <u>Name</u> | <u>Title</u> | <u>Home Address</u> | <u>Home Phone</u> (313) | <u>Office Phone</u> (313) 843-9100 |
|------------------|---------------------------|--|----------------------------|---------------------------------------|
| R. L. Barrett | Division Manager | 23303 Parke Lane Grosse Ile, MI 48138 | 675-0628 | Ext. 351 |
| Sydney Blum | Civic Affairs Coordinator | 13117 Ludlow Huntington Woods, MI 48070 | 541-3941 | Ext. 375 |
| R. W. Campbell | Engineering Manager | 265 Westwood Dr. Birmingham, MI 48009 | 540-8648 | Ext. 311 |
| R. H. Church | Maintenance Manager | 35564 Heritage Lane Farmington, MI 48024 | 478-6522 | Ext. 405 |
| M. R. Doran | Products Control Manager | 9399 Marlboro Allen Park, MI 48101 | 383-4278 | Ext. 261 |
| J. R. Kassarijan | Technical Service Manager | 2475 Canyon Ypsilanti, MI 48197 | 1-434-3094 | Ext. 332 |
| L. H. Varner | Operations Manager | 17173 Goldwin Southfield, MI 48075 | 552-0342 | Ext. 371 |

10/27/83

925
12-8-83
Harris
Code +

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

JACOB A. HOEFER
ROBERT HOLMES
E. M. LAITALA
HILARY F. SNELL
PAUL H. WENDLER
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

~~HOWARD B. TANKER, Director~~

Ronald Skoog, Director

Hazardous Waste Division
9311 Groh Road
Grosse Ile, Michigan 48138

October 19, 1983

CERTIFIED MAIL

Mr. Sydney Blum
Civic Affairs Coordinator
Marathon Oil Company
1300 South Fort Street
Detroit, Michigan 48217

Petroleum

Re: MID 005506357

Dear Mr. Blum:

On September 26, 1983, I visited the Detroit Marathon facility to determine compliance with the provisions of Subtitle C of the Resource Conservation and Recovery Act of 1976 (RCRA), as amended. In follow-up, you met with me at the Grosse Ile DNR office on September 29 for further discussion of Marathon's emergency response plans. The facility was reviewed as a generator, and was found to be maintaining a generally high level of compliance. Such violations as were noted and were not resolved during our meeting are discussed below:

1. In review of the waste manifests, the Generator Second Copy for manifest MI 161635 could not be located; further, no weight or volume was listed for this manifest. Please advise me of the status of this load of waste.
2. The emergency response plan does not have the home addresses and phone numbers, as well as office numbers, listed for all individuals qualified to act as emergency coordinator. This is required by 40 CFR 265.52 (d).

A copy of the RCRA inspection report is enclosed for your review. Please respond by letter no later than November 21, 1983, documenting what actions have been taken to correct the items listed above. If you have any questions,

Mr. Sydney Blum

Page 2

do not hesitate to call me at (313) 675-0860. I appreciate the cooperation you and your staff extended during the inspection and our follow-up meeting.

Sincerely,

Susan Norton

Susan Norton
Water Quality Specialist
Compliance Section
Hazardous Waste Division

SN

Enclosure

cc: Hazardous Waste Division, Lansing (3)

Michigan Refining Division



**Marathon
Petroleum Company**

1300 South Fort Street
Detroit, Michigan 48217-1294
Telephone 313/843-9100

October 18, 1983

Ms. Susan Norton
Michigan Department of Natural Resources
9311 Groh Road
Grosse Ile, Michigan 48138

Dear Ms. Norton:

Attached is signed Chem-Met copy verifying disposal of 7,000 gallons
of API separator sludge (Manifest #0161635) on August 12, 1983.

Sincerely yours,


Sydney Blum
Civic Affairs Coordinator

vh
att.

RECEIVED
OCT 20 1983
WATER QUALITY DIV.
DIST. I

WASTE DISPOSAL MANIFEST

☒ Act 64 Waste (HAZARDOUS)☐ Act 136 Waste☐ Other

MI0161635

| | | |
|---|--|---|
| Generator's Name Ma thon Petroleum Co. | Primary Transporter's Name Great Lakes Waterblasting | Treatment, Storage or Disposal Facility Chem-Met Services |
| Site Address 1300 South Fort Street Detroit, MI 48217 | Transporter's Address 163 N. Morrell St. Detroit, MI | Facility Address 18550 Allen Road Wyandotte, MI 48192 |
| Phone Number 313 843-9100 | Phone Number (313) 849-1800 | Phone Number (313) 282-9250 |
| Generator's Site EPA ID Number MI D 00 550 635 7 | Transporter's EPA ID Number MI D 0 874 845 5 6 | Facility Site EPA ID Number MI D 0 969 6 319 4 |

If more than one Transporter is to be utilized, give the Name and EPA I.D. Number of each:

| LOT NO. | U.S. D.O.T. Shipping Name (or common name if there is no D.O.T. shipping name). | D.O.T. Hazard Class | U.N./N.A. No. | Haz. Class Code | Container | | Form | | | | Total Weight or Volume | Units | Hazardous or Liquid Waste Number |
|---------|---|---------------------|---------------|-----------------|-----------|------|-------|--------|-----|--------|------------------------|-------|----------------------------------|
| | | | | | No. | Type | Solid | Liquid | Gas | Sludge | | | |
| 1 | Hazardous Waste Solid - n.o.s. A.P.I. Separator Sludge | ORM-E | NA9189 | 12 | 1 | PT | | | | X | 7000 | GAL | K 10 51 |
| 2 | | | | | | | | | | | | | |
| 3 | | | | | | | | | | | | | |
| 4 | | | | | | | | | | | | | |
| 5 | | | | | | | | | | | | | |
| 6 | | | | | | | | | | | | | |

Include Safety precautions and special handling instructions.

GENERATOR CERTIFICATION: I certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and U.S. EPA. I further certify that the information contained on the manifest is factual. I understand that the failure to accurately report all information requested by the manifest constitutes a violation of 1979 PA64 and/or 1989 PA136. I further understand that this manifest may be used in administrative and court proceedings.

Generator Signature

Date Shipped
MO. DAY YEAR① *Charles Tighe*

0.8/1.2/18.3

HAULER'S CERTIFICATION: I certify acceptance of the above identified wastes for transportation. I further certify that I shall deliver the hazardous wastes, together with this manifest, only to the destination specified by the generator on this manifest. I understand that this manifest can be used in administrative and court proceedings.

Transporter
Vehicle
I.D. No.

No. 1 AP 3129

Transporter Signature

Subsequent transporter(s) signature(s)

Date(s) Received

② *Frank P. Tabor*

If the shipment cannot be delivered, describe the reasons for non-delivery.

SDF CERTIFICATION: I certify receipt at this facility of the above identified wastes and that this facility is licensed to accept those wastes. I also certify that the wastes were accompanied by a manifest properly certified by both the generator and hauler and that this facility is the destination indicated on the manifest. I understand that this manifest can be used in administrative and court proceedings.

SDF Signature

Facility Site EPA ID Number

☒ Accepted
☐ Rejected

Date Received

Was a Surcharge Assessed?

☐ Yes
☐ No

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 800-292-4706 OR OUT-OF-STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-6342 24 HOURS PER DAY.

RCRA Inspection Report

EPA Identification Number: M 1 D 0 0 5 5 0 6 3 5 7

Installation Name: MARATHON OIL COMPANY

Location Address: 1300 SOUTH FORT

City: DETROIT State: MICHIGAN 148217

Date of inspection: SEPT. 26, 1983 Time of inspection (from) 8:30 A.M. (to) 11:25 P.M.

| Person(s) interviewed | Title | Telephone |
|------------------------|--------------------------------------|---------------------|
| <u>MR. SYDNEY BLUM</u> | <u>CIVIC AFFAIRS COORDINATOR</u> | <u>313/843-9100</u> |
| | | |
| | | |

| Inspector(s) | Agency/Title | Telephone |
|---------------------|---------------------------------|---------------------|
| <u>SUSAN NORTON</u> | <u>MICH. DNR/HAZ WASTE DIV.</u> | <u>313/675-0860</u> |
| <u>JAMES SCOTT</u> | <u>" " " "</u> | <u>517/373-2950</u> |

Installation Activity (mark only one box) Inspection Form(s)

- | | |
|--|----------|
| <input type="checkbox"/> Treatment/Storage/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation | A |
| <input type="checkbox"/> Treatment/Storage/Disposal (no generation or Transportation) | A |
| <input type="checkbox"/> Generation and Transportation | B, C |
| <input checked="" type="checkbox"/> Generation only | <u>B</u> |
| <input type="checkbox"/> Transportation only | C |

FILED FOR THE FOLLOWING TYPES OF WASTE:

- K048 - DAF FLOAT - GOES TO API SEP. → TO SLUDGE
- K049 - SLOPOIL EMULSION SOLIDS - OILS ARE RECOVERED, SOLIDS GO TO API SEPARATOR
- K050 - HEAT EXCHANGER BUNDLE CLEANING SLUDGE - TO API SEP → TO SLUDGE
- K051 - API SEPARATOR SLUDGE
- K052 - TANK BOTTOMS - REMOVED FROM TANKS, TAKEN TO CHEM-MEX

INSPECTION FORM B

Section A: Scope of inspection

Standards for generators of HAZARDOUS WASTE subject to 40 CFR 262.10

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

| | Yes | No | NI* | Remarks |
|---|----------|----|-----|---------|
| (1) Does the generator have copies of the manifest available for review? 262.40 | <u>X</u> | | | |
| (2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. <u>7</u> | | | | |
| (3) Do the manifest forms examined contain the following information? (If possible, make 262.21 copies of, or record information from, manifests that do not contain the critical elements) | <u>X</u> | | | |
| a. Manifest document number? | <u>X</u> | | | |
| b. Name, mailing address, telephone number, and EPA ID number of generator? | <u>X</u> | | | |
| c. Name and EPA ID number of transporter(s)? | <u>X</u> | | | |
| d. Name, Address, and EPA ID Number of designated permitted facility and alternate facility? | <u>X</u> | | | |
| e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)? | <u>X</u> | | | |
| f. The total quantity of waste(s) and the type and number of containers loaded? | <u>X</u> | | | |
| g. Required certification? | <u>X</u> | | | |
| h. Required signatures? | <u>X</u> | | | |
| (4) Reportable exceptions 262.42 | | | | |
| a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. <u>1</u> | | | | |
| b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. <u>NONE</u> | | | | |

GENERATOR 2ND COPY
COULD NOT BE LOCATED FOR
M1161635 - ALSO, NO WT OR
VOL. LISTED.

Section C - PRE-TRANSPORT REQUIREMENTS
(40 CFR Part 262 Subpart C)

Yes No NI Remarks

(1) Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30

~~NOT APPLICABLE~~
ACCUMULATION IS IN TANK TRUCK

(2) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required prior to movement of hazardous waste off-site)

262.31 and 262.32
NO WASTE PACKAGES ^{GENER} - NOT APPLICABLE

(3) If required, are placards available to transporter? 262.33

X _____

** (4) Pre-shipment Accumulation: 1 API SEPARATOR - GREAT LAKES WATERBLASTING LEAVES
TANK TRUCK ON PREMISES NEXT TO SEPARATOR - SLUDGE IS ACCUMULATED

** applies only to GENERATORS that store hazardous waste on-site for 90 days or less without a permit. These items do not apply to generators whose waste is immediately transported off-site.

a. Is hazardous waste accumulated in containers? If no, skip to b. 262.34

X _____

i. Is each container clearly marked with the date on which the period of accumulation began?

X _____

ii. Have more than 90 days elapsed since the dates marked?

~~///~~ X _____

iii. Is each container labeled or marked clearly with the words "Hazardous Wastes?"

X _____

iv. Are containers in good condition?

X _____

v. Are containers compatible with waste in them?

X _____

vi. Are containers managed to prevent leaks?

X _____

vii. Are containers stored closed?

X _____

viii. Are containers inspected weekly for leaks and defects?

X _____

ix. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).

X _____

| | Yes | No | NI | Remarks |
|--|-----|----|----|------------------------------|
| x. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.) | | | | N/A - NO INCOMPATIBLE WASTES |
| xi. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? | | | | |
| b. Is hazardous waste accumulated in tanks? If no, skip to c. 262.34 (January 11, 1982 revision) | | | X | |
| i. Is each tank labeled or marked clearly with the words "Hazardous Wastes"? 262.34 (January 1982 revision) | | | | NOT APPLICABLE |
| ii. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192 | | | | |
| iii. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures? | | | | |
| iv. Do continuous feed systems have a waste-feed cutoff? | | | | |
| v. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193 | | | | |
| vi. Are required daily and weekly inspections done? 265.194 | | | | |
| vii. Are reactive and ignitable wastes in tanks protected or rendered non-reactive or nonignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or nonignitable, see treatment requirements.) 265.198 | | | | |
| viii. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply.) 265.199 | | | | |

THIS SECTION NOT APPLICABLE

Yes No NI Remarks

- ix. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(see tables 2-1 through 2-6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

- c. Is hazardous waste accumulated in other than tanks or containers?

X

- d. Personnel training. 262.34 (a) 5

Do personnel training records include: 265.16

PERSONNEL TRAINING IS ALL-ENCOMPASSING FOR ALL HAZARDOUS MATERIALS, NOT JUST WASTES. TRAINING IN HAZ. WASTES IS A SPECIFIC UNIT, BUT MUCH APPROPRIATE INFO TO WASTE HANDLING IS GIVEN IN OTHER UNITS.

- i. Job Titles? _____
- ii. Job Descriptions? _____
- iii. Description of training? _____
- iv. Records of training? _____
- v. Did personnel receive the required training by 5-19-81? _____
- vi. Do new personnel receive required training within six months? _____
- vii. Do personnel training records indicate that personnel have taken part in an annual review of initial training? _____

X

X

X

X

X

X

X

- e. Preparedness and Prevention 265. Subpart C

- i. Maintenance and Operation of Facility:

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? 265.31

X

Yes No NI Remarks

- ii. If required, does this facility have the following equipment: 265.32

Internal communications or alarm systems?

X

Telephone or 2-way Radios at the scene of operations?

X

Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

X

Indicate the volume of water and/or foam available for fire control:

REFINERY IS FED BY 3 DIFF. WATER SUPPLIES — DETROIT, DEARBORN, & MELVINDALE —

FOR FIRE CONTROL

- iii. Testing and Maintenance of Emergency Equipment: 265.33

Has the owner or operator established testing and maintenance procedures for emergency equipment?

X

Is emergency equipment maintained in operable condition?

X

- iv. Has owner/operator provided immediate access to internal alarms (if needed)?

X

- v. Is there adequate aisle space for unobstructed movement?

X

- vi. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?

X

- f. Contingency Plan and Emergency Procedures 265 Subpart D

Does the contingency plan contain the following information:

THE SPCC DOES NOT COVER HAZARDOUS WASTE; HOWEVER, THE COMPANY HAS AN "EMERGENCY CONTROL PLAN" WHICH INCLUDES THE FOLLOWING INFORMATION:

- i. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.) 265.52

X

| | Yes | No | NI | Remarks |
|--|----------|----------|----|---|
| ii. Arrangements agreed to by local police departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37? | <u>X</u> | | | |
| iii. Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator. | | <u>X</u> | | |
| iv. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities? | <u>X</u> | | | SUGGESTED SHOVELS BE ADDED TO LIST FOR CLEAN-UP OF SLUDGE. |
| v. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes?) | | | | THERE IS NO PLAN FOR API SEPARATOR SLUDGE- AND ONE IS PROBABLY NOT NECESSARY EVACUATION ARRANGEMENTS FOR PRODUCTION OPERATIONS AT PLANT ARE MANAGED BY LOCAL FIRE DEPT. |
| vi. Are copies of the Contingency Plan available at site and local emergency organizations? | <u>X</u> | | | FIRE DEPT, POLICE DEPT, & ALL MANAGED AT FACILITY |
| vii. Is the facility emergency coordinator identified? | <u>X</u> | | | |
| viii. Is coordinator familiar with all aspects of site operation and emergency procedures? | <u>X</u> | | | |
| ix. Does the Emergency Coordinator have the authority to carry out the Contingency Plan? | <u>X</u> | | | |
| x. If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in 265.56? | | | | N/A - NO SUCH EMERGENCY HAS OCCURRED |

Section D: RECORDKEEPING AND REPORTING (Part 262, Subpart D)

Yes No NI Remarks

- (1) Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40

X

Section E: INTERNATIONAL SHIPMENTS (Part 262 Subpart E)

262.50

- (1) Has the installation imported or exported hazardous waste? If "no", skip a and b.

X

- a. Exporting Hazardous Waste, has a generator:

NOT APPLICABLE

- i. Notified the Administrator in writing?

- ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?

- iii. Met the Manifest requirements?

- b. Importing Hazardous Waste, has the generator met the manifest requirements?